

EXHIBIT E

1 UNITED STATES DISTRICT COURT
2 FOR THE DISTRICT OF MASSACHUSETTS
3

4 IN RE: PHARMACEUTICAL) MDL NO. 1456
INDUSTRY AVERAGE WHOLESALE) Master File No.
5 PRICE LITIGATION) 01-12257-PBS
)
6 THIS DOCUMENT RELATES TO) Subcategory Case No.
United States of America) 06-11337
7 ex rel. Ven-A-Care of)
the Florida Keys, Inc. v.) Hon. Patti B. Saris
8 Actavis Mid Atlantic LLC,)
et al., Civil Action No.)
9 08-10852)

10
11 CONTINUED VIDEOTAPED 30(b)(6) DEPOSITION OF

12 VEN-A-CARE BY JOHN M. LOCKWOOD, M.D.

13 Volume II

14 (Taken by Defendants)

15 July 28, 2009

16 8:59 a.m.

17 Omni Hotel at CNN Center

18 100 CNN Center

19 Atlanta, Georgia
20

21 Reported by: F. Renee Finkley, RPR, CRR, CLR,

22 CCR-B-2289

1 to -- to that list, and it appears that there is one
2 document that is referenced in that list, and that is
3 at the bottom of the list, with regard to Alparma.

4 A. Correct.

5 Q. I'd like to show you what has now been
6 marked as Exhibit 24.

7 (Exhibit Lockwood 024 was
8 marked for identification.)

9 THE WITNESS: Okay. Yes.

10 Q. (By Mr. Fleder) Is Exhibit 24 the
11 document that is referenced in interrogatory -- in
12 the answer to interrogatory number five,
13 Dr. Lockwood?

14 A. Yes.

15 Q. And would you please explain for the
16 record what Exhibit 24 is?

17 A. Exhibit 24 is a purchase that was made by
18 Ven-A-Care of the Florida Keys from a drug
19 distributor wholesaler named JJ Balan, and the
20 invoice date is 2/29/2000; and I think the final drug
21 on the list is Cromolyn Sodium, and the NDC number is
22 listed and it's an Alparma drug.